

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

|                                    |   |                        |
|------------------------------------|---|------------------------|
| GEORGE HART,                       | ) |                        |
|                                    | ) |                        |
| Plaintiff,                         | ) | 08 C 761               |
|                                    | ) |                        |
| v.                                 | ) |                        |
|                                    | ) |                        |
| OFFICER RUSSELL E. WHITE, JR.      | ) |                        |
| #13770, OFFICER JESUS CANO #13648, | ) | Judge St. Eve          |
| OFFICER KRAGNYCKWJ #15153,         | ) |                        |
| OFFICER JEFFREY J. ZWIT #10336,    | ) |                        |
| OFFICER LUIS VEGA #13853,          | ) | Magistrate Judge Brown |
| UNKNOWN OFFICERS, and the          | ) |                        |
| CITY OF CHICAGO,                   | ) |                        |
|                                    | ) |                        |
| Defendants.                        | ) |                        |

**DEFENDANT OFFICERS' AGREED MOTION TO EXTEND  
THE TIME IN WHICH TO ANSWER OR OTHERWISE PLEAD**

Defendants, Chicago Police Officers William Krasnyckyj, Luis Vega, Russell White, Jr., Jesus Cano and Jeffrey Zwit, by one of their attorneys, Kathryn M. Doi, Assistant Corporation Counsel, respectfully request this Honorable Court for an extension of time up to and including April 4, 2008 in which to answer or otherwise plead to Plaintiff's Complaint.

In support of this motion, Defendant states:

1. This matter was filed on February 4, 2008, naming the above-listed individual officers and the City as defendants.
2. Summons and Complaint have recently been personally served on each of the Defendant Officers.
3. The undersigned has not yet been able to interview the police personnel necessary to answer or otherwise plead to Plaintiff's Complaint.

4. The undersigned also has ordered, but has not yet received, any of the Chicago Police Department records to enable Defendant Officers to properly respond to Plaintiff's Complaint.

5. This motion is Defendant Officers' first request for an extension of time to answer or otherwise plead. Such a request will not unduly delay the resolution of the disputed issues, nor will it prejudice the plaintiff.

6. Moreover, this Court granted Defendant City's motion to extend time to answer or otherwise plead to Plaintiff's Complaint on March 6, 2008. Defendant City was granted up to and including April 4, 2008 to answer or otherwise plead.

7. Plaintiff's counsel was informed of the content of this motion on March 6, 2008 and agrees with its terms.

**WHEREFORE**, Defendant Officers respectfully request that they be given until April 4, 2008 to answer or otherwise plead to Plaintiff's Complaint.

Respectfully Submitted,

/s/ Kathryn M. Doi  
KATHRYN M. DOI  
Assistant Corporation Counsel

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